

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



CASE NO. 00-6032-CR-ZLOCH/SELTZER

UNITED STATES OF AMERICA)
)
)
v.)
)
)
LIONEL HANNA,)
)
)
Defendant.)
_____)

**GOVERNMENT'S SUPPLEMENTAL RESPONSE
TO STANDING DISCOVERY ORDER**

The United States files this supplemental response to the Standing Discovery Order issued in this case. This supplemental response is numbered to correspond to that Order.

- A. 5. Books, papers, documents, photographs, tangible objects, buildings or places which the government intends to use as evidence at trial to prove its case in chief, or were obtained or belonging to the defendant may be inspected on a mutually convenient time at the Office of the United States Attorney, 500 East Broward Boulevard, Suite 700 in Fort Lauderdale, Florida. Please call the undersigned to set up a date and time that is convenient to both parties. The attachments to this discovery response are not necessarily copies of all the books, papers, documents, etc., that the government may intend to introduce at trial. Such attachments include the following: 2 reports of BSO forensic chemist Randy Hilliard dated 5/8/00 and 1/19/00.
- B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.
- H. The government will advise the defendant prior to trial of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E.



404(b). You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine). In addition, the government may introduce under Rule 404(b) evidence underlying the defendant's past criminal activity that has resulted in arrests and/or convictions and which is summarized in the attached court documents.

- K. 2 reports from BSO forensic chemist Randy Hilliard dated May 8, 2000 and January 19, 2000 analyzing substances seized from the automobile driven by the defendant and residence are hereby attached.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense was:

Time: Approximately 2:25 p.m. to about 6:45 p.m.

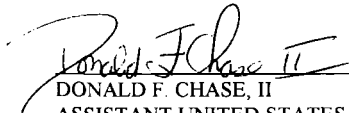
Date: January 7, 2000

Place: I95 Northbound and the New River Bridge; I95 Northbound off-ramp on to Broward Boulevard; 11th Avenue and Broward Boulevard; and 416 NW 14 Way; all locations being in Broward County, Florida

Respectfully submitted,

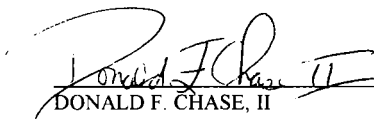
THOMAS E. SCOTT
UNITED STATES ATTORNEY

By:


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY
Court No. A5500077
500 East Broward Boulevard, Suite 700
Fort Lauderdale, Florida 33394
Tel: (954) 356-7255
Fax: (954) 356-7336

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered by United States mail this 10th day of May 2000 to Don Cohn, Esq., 1504 NW 14th Street, Miami, Florida 33125.


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY